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January 18, 2012

Clerk of the Court  
Washington Supreme Court  
*via email*

RECEIVED VSC  
SUPREME COURT  
STATE OF WASHINGTON  
Jan. 18 Jan 20, 2012, 10:48 am  
BY RONALD R. CARPENTER  
CLERK  
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**RE: In re PRP of Jackson, No. 82363-4**

Clerk of the Court:

Pursuant to RAP 10.8, Petitioner submits the following additional authority:

*In re PRP of Coats*, \_\_ Wn.2d \_\_, \_\_ P.3d \_\_, 2011 WL 5593063 (2011).

¶ 14 “However, a careful review of our cases reveals that we have only found errors rendering a judgment invalid under RCW 10.73.090 where a court has in fact exceeded its statutory authority in entering the judgment or sentence. For example, we have found judgment and sentences invalid when the trial judge has imposed an unlawful sentence. We found invalidity when the offender has been given a longer sentence than the statutory maximum authorized by law.”

¶ 16 “Thus, we have regularly found facial invalidity when the court actually exercised a power it did not have.”

¶ 21 “Taken together, we have found invalidity based upon charging documents, verdicts, and plea statements of defendants on plea of guilty.”

Sincerely,  
/s/ Jeffrey Ellis  
Jeffrey Ellis  
*Attorney at Law*

ORIGINAL

## OFFICE RECEPTIONIST, CLERK

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**To:** Jeffrey Ellis  
**Cc:** nancy@washapp.org; Hilary Thomas; Kathleen Proctor & melody crick  
**Subject:** RE: 82363-4 - PRP of Jackson (consolidated w/83923-9 - PRP of Rivera)

Rec'd 1/18/2012

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

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**From:** Jeffrey Ellis [<mailto:jeffreyerwinellis@gmail.com>]  
**Sent:** Wednesday, January 18, 2012 10:01 AM  
**To:** OFFICE RECEPTIONIST, CLERK  
**Cc:** nancy@washapp.org; Hilary Thomas; Kathleen Proctor & melody crick  
**Subject:** Re: 82363-4 - PRP of Jackson (consolidated w/83923-9 - PRP of Rivera)

Attached please find a statement of additional authority to be filed in this case. This statement has been simultaneously served on all counsel by sending this email and its attachment to respective counsel.

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Jeff Ellis  
Attorney at Law  
Oregon Capital Resource Counsel  
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